

## ROUTING AND TRANSMITTAL SLIP

Date

09/19/2016

TO: (Name, office symbol, room number,  
building, Agency/Post)

Initials

Date

1. Armann, Steve (LND-4-1)

2. Tom Huetteman (LND-4)

3. Steven Barhite for Jeff Scott (LND-1)

4. Cynthia Ruelas (LND-4-2) ----- FOR DISTRIBUTION

5. Patrick Wilson (LND-4-1) - HHRA

PW

09/19/2016

<input type="checkbox"/>	Action	<input type="checkbox"/>	File	<input type="checkbox"/>	Note and Return
<input checked="" type="checkbox"/>	Approval	<input type="checkbox"/>	For Clearance	<input type="checkbox"/>	Per Conversation
<input type="checkbox"/>	As Requested	<input type="checkbox"/>	For Correction	<input type="checkbox"/>	Prepare Reply
<input type="checkbox"/>	Circulate	<input type="checkbox"/>	For Your Information	<input type="checkbox"/>	See Me
<input type="checkbox"/>	Comment	<input type="checkbox"/>	Investigate	<input checked="" type="checkbox"/>	Signature
<input type="checkbox"/>	Coordination	<input type="checkbox"/>	Justify	<input type="checkbox"/>	

## REMARKS

EPA is issuing an approval letter to UTC for management of PCBs in concrete at the 47-acre parcel of land located at 6633 Canoga Avenue, in Canoga Park, California. The facility will be undergoing demolition activities in preparation for divestment and subsequent redevelopment for residential/commercial uses. UTC has conducted at risk assessment and established a site-specific remediation goal of 0.12 ppm PCBs. As part of the demolition efforts, the concrete floor of the facility will be either removed and transported off-site or reused as backfill at the site. Impacted concrete greater than 0.12ppm will be transported off-site and disposed of at the appropriate disposal facility. Concrete with in-place concentration of <0.12 ppm PCBs will be processed and used as backfill at the site.

DO NOT use this form as a RECORD of approvals, concurrences, disposals,  
clearances, and similar actions

FROM: (Name, organization symbol, Agency/Post)

Cynthia Ruelas (LND-4-2)

Room Number - Building  
Cube 16143Phone Number  
2-3329

AUTHORIZED FOR LOCAL REPRODUCTION

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OPTIONAL FORM 41 (REV. 3/2007)

Previous Edition is Usable



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

SEP 21 2016

Mr. David Curnock  
Remediation Manager  
United Technologies Corporation  
EHS Department  
9 Farmsprings Road, MS 9FS101  
Farmington, CT 06032

**Re: EPA Approval for Management of PCBs at the Former Pratt & Whitney-Rocketdyne  
Canoga Avenue Facility, 6633 Canoga Park, California, LARWQCB Case #0237A**

Dear Mr. Curnock:

Thank you for your submission of the *Self-Implementing Cleanup and Disposal Plan (SIP)* dated June 27, 2016 (SIP), and the *Soil Management Plan for Assessment, Remediation and Confirmation Sampling of Vadose Zone Soils* dated November 2015 (SMP) for the facility located at 6633 Canoga Park, California (Site). The SIP and SMP were prepared by Haley and Aldrich, Inc. (Haley and Aldrich) on behalf of United Technologies Corporation (UTC). The U.S. Environmental Protection Agency (EPA) has reviewed the SIP and SMP and is issuing this approval for management of building materials impacted with polychlorinated biphenyls (PCBs) at the Site, in accordance with the Toxic Substance Control Act (TSCA) pursuant to 40 C.F.R. § 761.61(a) and (c). Additionally, the data presented in the SMP provides an adequate basis for the EPA to conclude that the site-specific threshold for total PCBs developed for the facility is protective of human health and the environment and will not pose an unreasonable risk.

The EPA is approving this self-implementing notification under both 40 CFR 761.61(a) and (c) because some of the sampling was not conducted consistent with the self-implementing requirements of 40 CFR 761.61(a). Additional sampling to meet the prescriptive requirements of 761.61(a) is not necessary at this Site. The EPA agrees that adequate sampling was conducted for characterization and disposal and is, therefore, approving the sampling under the risk based option in 40 CFR 761.61(c).

The EPA understands that UTC owns and operates the Site, except for a small on-site electrical substation which is operated by the Los Angeles Department of Water and Power (LADWP). During a conference call between the EPA and UTC on August 16, 2016, UTC indicated that to their knowledge there are no PCB or PCB-contaminated electrical equipment at the on-site electrical substation. UTC also indicated that the LADWP is responsible for the proper removal and disposal of equipment at the electrical substation.

The facility is no longer active and is undergoing demolition activities in preparation for future divestment. The proposed future use at the Site is mixed residential/commercial. The EPA has reviewed the SIP and concludes that adequate characterization of PCBs was conducted. The SIP also provides a conservative approach for removal and disposal of PCB-impacted concrete at the Site. Although the EPA considers there to be an unlikely potential for PCBs generated at the Site to impact nearby surface water bodies or groundwater, the EPA remains concerned with the potential for other chemicals of concern (primarily

metals and volatile organic compounds) to contaminate surface water bodies or groundwater. UTC has indicated that the Los Angeles Regional Water Quality Control Board (LARWQCB) remains involved with investigation and remediation efforts at the Site for other chemicals of concern. EPA recommends that UTC continue working with LARWQCB during and succeeding demolition efforts to ensure proper containment and disposal of these chemicals of concern.

This approval does not relieve the Parties and their consultants from complying with other applicable TSCA PCB and Federal regulations, or state and local regulations and permits. Nothing in this document bars EPA from imposing penalties for violations of other applicable TSCA PCB requirements or for activities not covered under this approval.

This approval only applies to the site that is the subject of this investigation/remediation effort. EPA reserves the right to require additional characterization and/or cleanup of PCBs at the Site if new information shows that PCBs remain at the Site above the EPA-approved PCB cleanup levels, or if PCBs are found at other areas of the Site or immediately adjacent to the Site.

If you have any questions concerning this approval, please contact Cynthia Ruelas of my staff at (415) 972-3329. Thank you for your cooperation.

Sincerely,



Jeff Scott  
Land Division

Electronic cc: Ana Townsend, Los Angeles Regional Water Quality Control Board  
Kelly Hogan, Haley and Aldrich